



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 8, MONTANA OFFICE**  
**FEDERAL BUILDING, 10 West 15<sup>th</sup> St, Suite 3200**  
**HELENA, MONTANA 59626**

Ref: 8MO

August 23, 2010

Ms. Julie King, Supervisor  
Bitterroot National Forest  
1801 North 1<sup>st</sup> Street  
Hamilton, Montana 59840-3114

Re: CEQ # 20100284; EPA Comments on  
Lower West Fork Project FEIS and ROD

Dear Ms. King:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Bitterroot National Forest's Lower West Fork Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

The ROD for the Lower West Fork Project states that Alternative 3 with modifications has been selected as the final preferred alternative, involving use of commercial thinning, non-commercial thinning and prescribed fire to reduce fuels on 4,131 acres. Approximately 88 percent of proposed treatments proposed would be in the wildland urban interface (WUI).

The EPA is pleased that you have selected Alternative 3 modified as the final preferred alternative, since it includes many activities that will contribute toward restoration of watersheds in the Bitterroot River Headwaters Total Maximum Daily Load (TMDL) Planning Area. We support vegetation management activities that reduce fire risks and improve forest resilience to fire, insects and disease, particularly to restore declining species such as Ponderosa pine and western larch, and also promote watershed restoration. It is important that the proposed Lower West Fork project be consistent with the Bitterroot Headwaters Water Quality Restoration Plan and TMDL. Watershed restoration activities in the preferred alternative include decommissioning of 26 miles of road and storage of 18 miles of road, removal of 33 culverts, 23 of which contribute sediment to streams, and replacement or removal of 7 culverts blocking fish passage. We are also pleased that no new permanent roads are proposed, since roads are often major anthropogenic sources of sediment that affect hydrology, water quality, fisheries and wildlife on public lands, although approximately 1.8 miles of new temporary road and 1.6 miles of tracked line machine trail will be used to access treatment units and remove timber.

In addition, we appreciate the inclusion of activities to address soil disturbance through rehabilitation of log landings, burn piles, and skid trails, including rehabilitation of historic terrace plantations and skid trails that have high levels of detrimental soil disturbance so that improvement in soil conditions are projected over the long-term. We also want to acknowledge the modification of proposed treatments in unit 1 with 19 percent detrimental soil disturbance to avoid increasing soil disturbance during treatments (i.e., avoid use of heavy equipment and retain higher amounts of coarse woody debris in areas of high existing soil disturbance in this unit).

The EPA appreciates the opportunity to review and comment during the NEPA process, as well as the opportunity to review the proposed project in the field. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at [potts.stephen@epa.gov](mailto:potts.stephen@epa.gov). Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie A. DalSoglio". The signature is fluid and cursive, with the first name "Julie" being more prominent.

Julie A. DalSoglio  
Director  
Montana Office

cc: Larry Svoboda/Connie Collins, EPA 8EPR-N, Denver  
Dave Campbell, District Ranger, Sula  
Robert Ray/Mark Kelley, MDEQ, Helena